The Almega Corporation

file 031600 AME

EPA Region 5 Records Ctr. 307738

New Battery, Ducon Scrubber System Particulate Emission Measurements,

Formal EPA Tests
Republic Steel

August 11, 12 and 13, 1983
The Almega Corporation Project I-5766
The Almega Corporation Report I-5766-1

REPUBLIC STEEL CORP.
CHICAGO DISTRICT
RECEIVED

AUG 24 1983

in the December

The Almega Corporation

607 C Country Club Drive Bensenville, Illinois 60106 Phone: (312) 595-0175

August 19, 1983

Republic Steel 116 and Burley Avenue Chicago, Illinois 60617

Attention: K.W. Hazard, Chief Engineer

Subject:

· 65.

Particulate Emission Measurements, New Battery Ducon Scrubber System

Formal EPA Tests Republic Steel

August 11, 12 and 13, 1983

The Almega Corporation Project I-5766
The Almega Corporation Report I-5766-1

Gentlemen,

INTRODUCTION

Testing was performed on August 11, 12 and 13, 1983 to measure the particulate emission rates at the outlet of the Ducon Scrubber System controlling the coal charging emissions on the new battery at Republic Steel.

The purpose of the tests was to establish the particulate emission rates of the plant when operating at rated capacity, for comparison with EPA emission regulations.

Testing was performed by Meryl R. Jackson, T. Armstrong and J. Bowman of The Almega Corporation. The plant was operated by personnel of Republic Steel. Plant operating data were recorded by personnel of Republic Steel. Tests were witnessed by John Connell and John McGuire of USEPA and by Fred Smith of Illinois EPA.

DESCRIPTION OF PLANT

Coal charging emissions are picked up at the charge machine on the top of the battery, and are conveyed to a Ducon venturi scrubber located at the south west corner of the battery. The venturi throat opening is adjustable by vane dampers. The venturi opening and liquid flow rates were preset by Republic Steel and its contractors prior to this test series.

The scrubbed exhaust gas is passed via two parallel I.D. fans to a free standing stack and discharged at a height of approximately 100 feet.

THE Almega Corporation

Republic Steel Page three

Particulate concentratin and emission rate was determined following Method 5 (Ref. 1) included in Appendix F. The gas velocity and moisture determinations were conducted simultaneously with the particulate emission testing.

The particulate catch included nozzle, probe, and prefilter washings, and filter particulates as detailed in Method 5.

A pyrex glass-lined stainless steel sampling probe and stainless steel sampling nozzle was used for all test runs.

Test results are expressed in terms of grains/scf db, lbs/scf db, lbs/hr.

SUMMARY OF TEST RESULTS

Results of the particulate test series are summarized in Table 1.

The field test, laboratory analysis data, and calculation summaries are presented in Appendix G.

Copies of relavent equipment calibration data are presented in Appendix H. Equipment leak check data are recorded on the field data sheets.

Chain-of-Custody records are presented in Appendix I.

DISCUSSION OF TEST RESULTS

Test results show an averaged particulate emission concentration of 0.02 grains/scf, measured during 24 coal charge periods.

CONCLUSION

A series of particulate emission tests were performed on the Ducon Scrubber System on August 11 to 13, 1983. Test results show the emission concentration to be 0.02 grain/scf.

We are pleased to have been of service to Republic Steel and look forward to further opportunities of serving your needs.

Respectfully submitted,

THE ALMEGA CORPORATION

Meryl R. Jackson, Vice President

THE Almega Corporation

SUMMARY OF EMISSION TEST DATA

TABLE:

1

PLANT:

Ducon Scrubber System

LOCATION:

Republic Steel

REPETITION #:	2	3	4
TEST DATE:	8/11/83	8/12/83	8/13/83
STACK GAS			
Temperature, average OF	116.5	113.0	117.7
Velocity average fps	35.0	35.1	34.9
Volume flow x 10 ⁶ sofh db	1.705	1.733	1.706
Orsat, average % CO ₂	0.2	1.0	0.4 1974
02	18.9	18.9	19.0 7
CO	0.1	0.5	0.1
Moisture %	4.7	5.5	5.4
PARTICULATE SAMPLE			
Time, hrs:mins:secs	1:43:25	1:35:25	1:34:41
Volume scf db	65.905	62.678	60.523
Particulates collected, gran		0.0790	0.0718
Isokinetic Ratio, I%		•	
90 ≤ I ≤ 110	100.7	102.1	100.8
PARTICULATE		·	•
Concentration grains/scf db	0.023	0.019	0.018
x 10 ⁻⁶ lbs/scf db	3.249	2.779	2.616
Emissions lbs/hr	5.54	4.82	4.63

The Almega Corporation

`	REFERENCES	
	1	Title 40: Code of Federal Regulations
	APPENDICES	
	A	Confirmation of Test Protocol
	В	Method 1 Sample and Velocity Traverses for Stationary Sources
	С	Method 2 Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)
	D	Method 3 Gas Analysis for Carbon Dioxide, Excess Air and Dry Molecular Weight
	E	Method 4 Determination of Moisture in Stack Gases
	F	Method 5 Determination of Particulate Emissions from Stationary Sources
	G	Field Test and Laboratory Data and Summary Calculation Sheets
	H	Equipment Calibration Data
	r	Chain-of-Custody Records

Malf(Wang)



DATE:	February 14, 19	84	1.U.#:_	031 600		
	Sy Levine, Regio	n I Manager	Date of	Inspecti	on: January 27,	1984
FROM:	Edward Ogowski &	O		RE	CEIVED	
SUBJEC	FACILITY Republ	ic Steel, Coke Pla	nt	F	EB 2 1 1534	
ı	ADDRESS: <u>11600 S</u>	. Burley Avenue,	Chicago,	IL. JEPA	- DAPC - SPELD	.
1	CONTACT/TITLE: M	r. Mike Thomas, En	v. Engine	er	PHONE:	
PRE-I	NVESTIGATION STA	TUS:				
	er		t	(S) ((T) (U) ((V) (W) (V) (W) (V) (V) (V) (V) (V) (V) (V) (V) (V) (V	Random/Non-tradi HC Chicago TSP Chicago A-l (Act. 100 t, B Facility (unc Multimedia Probi Service Stations Petrochemical Pi	/y) . 100) lems
INSPE	CTION FINDINGS:					
Peri	mit Violation	X Warning Letter To Form 2 Report To Quarterly Rep	t	X TAS (X Form X Flow)	Coded 177	

NARRATIVE:

On January 27, 1984 an inspection was conducted of Republic's coke oven by Mr. Cezary Krzymowski and the author. Mr. Mike Thomas, Environmental Engineer, was contacted about the inspection.

The inspection of the battery started with the inspection of the oven doors. No doors were observed leaking on the coke side while seven doors (numbers 32, 36, 38, 46, 47, 57 and 58) were observed leaking on the push side. The percentage of leaking door is 5.83 percent. The allowable is ten percent. The doors were in compliance.

After inspecting the doors, the author timed the charging emissions while Mr. Krzymowski inspected for leaking lids and offtaking piping. Mr. Krzymowski observed zero leaking offtake pipes and six leaking lids. The percentage of leaking offtake pipes was determined to be zero while the percentage of leaking lids was determined to be 2.5 percent. The allowable for offtake piping is five percent while charging hole lids is two percent. The offtake piping was in compliance, while the lids were not in compliance.

Five ovens were observed to be charged. (Ovens.1, 3, 5, 7 and 9). Emissions from the charging of the five ovens totaled to 2.63 seconds. The allowable is 55 seconds. Charging was determined to be in compliance.

Mr. Thomas was asked about the current rate of coke production. Mr. Thomas stated that the battery is currently being operated at a rate of 66 ovens pushed per day. Design of the battery allows a maximum of 90 ovens pushed per day. Three pushes were observed on ovens one, five and seven by Mr. Krzymowski. Pushing emissions capture efficiency appeared to be at least 90% and the opacity of non captured emissions was less than 20% while the baghouse stack opacity was zero. No formal readings were taken due to the marginal position of the sun at the time of the observations.

A CIL was sent on February 2, 1984 regarding the leaking lids. Mr. Thomas stated that he would experiment with different lid sealing compounds.

E0/gp/1751A

COKE OVEN BATTERY INSPECTION CHECKLIST

Company Name: Pepublic Address: 11600 S. Blirry Ave.								Observer: Fosausk, C Krzymowski Observation Date: 1-27-84 Other Representatives Present:					
Weather Conditions: Cheer, and													
CHARG	:: ING	OPERA 1	TIONS			*			•				
Sattery No.	Oven No.	Start Time of Charge	End Time of Charge	Total Charge Time	Seconds of Visible Emissions	Coal Charged (Lhs)	Larry Car No:	Main Pressure (mm)	Steam Presaura (psi)	Bulk Density (Lbs/ft)	Comments		
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STAN	DPIP	<u> </u>	#1 B	atter	У			#2 Ba	tery		Total Sidp Leaks		
LEAKS O									<u> </u>				
CHAR LID		HOLE S	#1 B	atter		2 56		#2 Ba	tery	- ·	Total Lid Leaks		
			<u>, </u>	<u></u>	<u> </u>		<u>-</u>						

Observer's Signature: Date:



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DATE:

March 27, 1984

TO:

FROM:

SUBJECT:

Cezary Krzymowski Republic Steel - Permit Conditions

ID# 031 600 AMC

Aill ID file FOS

RECEIVED

MAR 29 1984

IEPA - LAPC - SPFLD

During the March 14, 1984 pre-enforcement conference, Republic expressed certain changes they would like made in the permit conditions as stated in the authors memo of March 5, 1984. These are as follows:

They requested that the coke battery charging scrubber 1). stack condition requiring a 0.02 gr/dscf emissions limitation be changed to 0.03 gr/dscf. They feel this condition is too tight even though they met it as an average of three stack tests whose results were 0.023, 0.019 and 0.018 gr/dscf. This condition was taken from their IEPA construction permit application and was not a part of the USEPA PSD permit.

The author recommends that this condition remain at 0.02 gr/dscf. This outlet concentration is routinely attainable for high pressure drop venturi scrubbers as a review of other stack tests and Republic's stack test indicates. Since the nature of coke oven charging emissions are known or suspected carcinogens sometimes reported as benzene solutile organics (BSO) it would be inappropriate to allow a looser standard. The author believes that with proper maintenance the 0.02 gr/dscf standard can be achieved on a continuous basis. Should any problems arise in the future they can petition the Agency for relief at that time.

2). They inquired whether they would be required to retest their combustion stack at different production capacities when they switch to enriched blast furnace gas. They presently push 66 ovens per day and design output is 90 ovens per day which they believe might not ever be reached.

The author recommends that the test be conducted 30 days after the commencement of enriched blast furnace gas firing at the production rate schedule in effect at that time. Although increased production rates are not forseen to have a significant adverse effect on underfiring combustion efficiency and stack effluent, the Agency reserves the right to request a stack test at any time stack opacity observations indicate an increase from those observed during the stack test.

March 27, 1984 ID# 031 600 AMC Republic Steel

> 3). They requested that the 20% opacity limit specified in their PSD permit be reduced by using some type of averaging method.

Conversations with Ed Wojciechowski of USEPA indicated that this would be acceptable. The author recommends that opacity data reduction be accomplished by averaging six highest consecutive readings in each push for five consecutive pushes.

4). They stated that the Q-BOP furnaces were designed to operate one at a time only and that in order to operate simultaneously they would have to extensively rebuild the system.

The author agrees that this condition can be deleted.

5). The Q-BOP turndown bell valve damper system has now been automated and they requested that this language be rewritten.

The author agrees that Republic rewrite this condition language to suit the present operating practices.

6). They inquired whether the standard for leaking coke oven doors was 5% or 10%.

The author stated it was 5% as written in the USEPA PSD permit copy supplied by Republic with their permit application. The June 21, 1982 IEPA Permit Section letter to Republic was in error. FOS has been using 5% as the standard during inspections.

After approval of the above changes, a redraft of the permit conditions will be given to Republic.

CK/qp/1908A

cc: Dan Goodwin Miles Zamco Peter Orlinsky Permits File JO BE ATTACHED TO INJUCTION MEMORANDUMS - FOR INTERNAL AGENCY USE ONLI.



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

(For Internal Use Only	Date of Inspection I.D.#: 031 600 public Steel (LTV)	on: August 8, 1984 RECEIVE AMC R/D: 105 AUG 29 1984
146111031	500 S. Burley Avenue, Chicago, IL	
Contact/Title: N	Ir. Mike Thomas, Envir. Engineer	Phone:
PRE-INVESTIGATION STAT X Workplan X Quarterly Report X MIR Other	X (A)Task Force B)On Program (C)Violator (D)NESHAPS (F)NSPS (I)A-2 (J)Special Request (M)Asbestos Demolition	(R)Random/Non-Traditional (S)HC Chicago (T)TSP Chicago (U)A-l (V)B Facility (W)Multi-Media Problems (X)Service Station (Z)Petrochemical Plants
INSPECTION FINDINGS: Emission Violation Permit Violation Permit Condition Violation X NO VIOLATION Flag File L 532-1244 APC 421 7/84	CIL To MIR To Quarterly Report Multi-Media Issue Possible LandNoiseWater	X TAS Checked X TAS Coded X Form 177 Compliance Flow Malfunction Copy to Facility Frequency Change

The offtake pipings were then inspected for leaks. Three were observed to be leaking (7, 16, and 56). The percentage of leaking offtake pipings was five. The allowable is five percent. offtake pipings were in compliance.

The charging lids were then inspected for leaks. Four lids were observed to be leaking (8-2, 38-1, 46-4, and 49-2). The percentage of leaking lids was 1.6 percent. The allowable is two percent. The lids were in compliance. The luting compound currently used on the lids is a premixed emulsion from Nalco.

The charging emissions were then timed. Five ovens were observed to be charged (ovens 15, 17, 19, 21, and 23). Emissions from the charging of the five ovens totaled 0.00 seconds. The allowable is 55 seconds. Charging emissions were in compliance.

Upon completion of the timing of the charging emissions, a sample of the quench tower make up water was taken. Analysis of the sample were not available at the time of this memo.

Mr. Thomas was then asked about the current rate of coke production. Mr. Thomas stated that the battery is currently being operated at a rate of 85 ovens pushed per day. Design of the battery allows a maximum of 90 ovens pushed per day. information will be coded in the TAS.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Division of Air Pollution Control--Field Operations Section

DATE:	August 20, 1984	Date of Inspection: August 8, 1984
/1/	Sy Levine, Mgr., Region 1	I.D.#: 031 600 AMC RECEIVED
FROM:	Edward Osowski (O	Region: 1 District: 5 AUG 29 1984
	Republic Steel (I	LTV) IEPA DAPC - SPFLD
	Address: 11600 S. Burley A	Avenue, Chicago, Illinois
	Contact/Title: Mr. Mike Thom	nas, Envir. Engineer Phone:

On August 8, 1984, an inspection was conducted of Republic Steel's Coke Battery. Mr. Mike Thomas, Environmental Engineer was contacted about the inspection.

The inspection of the battery started with the observation of the oven doors. Four doors (5, 9, 11, and 13) were observed leaking on the coke side while five doors (9, 10, 11, 12, and 58) were observed leaking on the push side. The percentage of leaking doors is 7.50 percent. The allowable is ten percent. The doors were in compliance.

The offtake pipings were then inspected for leaks. Three were observed to be leaking (7, 16, and 56). The percentage of leaking offtake pipings was five. The allowable is five percent. The offtake pipings were in compliance.

The charging lids were then inspected for leaks. Four lids were observed to be leaking $(8-2,\ 38-1,\ 46-4,\ and\ 49-2)$. The percentage of leaking lids was 1.6 percent. The allowable is two percent. The lids were in compliance. The luting compound currently used on the lids is a premixed emulsion from Nalco.

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ID# 031 600 AME August 20, 1984

Page 2

Hyrdogen sulfide compliance monitoring was then discussed with Mr. Thomas. Mr. Thomas stated that a grab sample is taken once a day. The hydrogen sulfide concentration is then determined using a starch-iodide procedure.

Finally, Mr. Thomas was asked if any changes in operations had occurred at the facility. This was due to two complaints being received about kish in the neighborhood. Mr. Thomas stated that no changes in operations or equipment had occurred.

The complaints and the coke oven battery inspection checklist are attached with this memo.

E0/gkw/0245A

CC - M. Zameo

- Permit Section
- Region 1 FIle

ILLINOIS E.P.A.

COKE OVEN BATTERY INSPECTION CHECKLIST

Address: 11600 Burley Ave							Observer: F. C. Sourite. Observation Date: 9-9-9-1 Other Representatives Present: Mike Thomas						
Weather Conditions: Clear, hot								<u>LT</u>	V				
CHARG	ING	OPERA:	rions										7
Battery No.		Start Time of Charge	End Time of Charge	Total Charge Time	Seconds of Visible Emissions	Coal Charged (Lbs)	Larry Car No:	Main Pressure (mm)	Steam Pressure (psi)	Bulk Density (Lbs/Ft)	Convents		
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STANDPIPE #1 Battery							#2 Ba	ttery			Total Std	p Leaks	
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CHARGING HOLE #1 Battery LID LEAKS [2] [38,1] [44,47, [44,2]						#2 Ba	ttery	-		Total Lid	Leaks		
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Observer's Signature:
Date:

2/83

State of Illinois	Date of Call. $\frac{7/11/84}{(2.20)}$
Environmental Protection Agency	Time of Call / 12:20
Environmental Protection Agency Division of Air Pollution Control	Received by
COMPLAINT	RECORD
Suspect Source Information: Name Chubic Steel Address 1/600 So. Barrey Ave.	Complainant Information: Name Aronymaas Address City, Zip
City, Zip Chicage, Ill. 60617	City, Zip
Area Code/Phone	Area Code/Phone
City, Zip Chicago, TII. 60617 Area Code/Phone I.D. # 03/600 Amc	
Type of Complaint: [] Dust [] Odors Nature of Complaint: Adding C	[] Smoke [A Other Smill penticles of g
Nature of Complaint: Hading &	emething to Steel maybe
SILICONE OF GRADUATE AND Just	ich it comes but of the
Stack it falls and it is I takes it is so small it	lery small just like pepper comes into the screens
and gets all over every &	the furniture It use to
it is hard to art off bf	the furniture It use to
go on just once and a	while now it happens very
offer when you go out	it gets all an your skin.
Thinks it is had to be	breatlying stuff like this
Referred to: Unit A [] Unit B	[] Unit C [] Other
Comments: Mo	

[] <u>DISTRIBUTION</u>: <u>Original</u> and <u>Copy</u> - Unit Supervisor

Copy - Wang

KK/rs/1254A (9/08/83)

State of Illinois	.•	Date of Call_ 8-7-84
Environmental Protection	Agency	Time of Call 4:10
Division of Air Pollution	Control	Received by Janne

COMPLAINT RECORD

•	•
Suspect Source Information:	Complainant Information:
Name Republic Skel	Name Thomas Granczewski
Address	Address 11358 Avenue O
City, Zip Chicago	
Area Code/Phone	Area Code/Phone 374-0/36
I.D. # <u>03</u>	
	-
Type of Complaint: Dust [] Od	ors [] Smoke [] Other
Nature of Complaint:	ora [] amove [] orner
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11ves behind Q-OOF	and says that for the past
two weeks there has been	na continuous otream of
dirt (graphite) coming for	on the root
Referred to: 🔀 Unit A [] Unit B	[] Unit C [] Other Ed 6.
Comments:	
[] <u>DISTRIBUTION</u> : <u>Original</u> and <u>C</u>	ooy - Unit Supervisor <u>Copy</u> - Wang
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

EMORANDUM

DATE:

February 10, 1986

TO:

Sy Levine

FROM:

C. Krzymowski

RECEIVED

FEB 1 8 1986

IEPA - DAPC - SPFLD

LTV Steel - Coke and By-Products Plant Inspection SUBJECT:

> An inspection of the coke and by-products plant was conducted on Feb. 7. 1986 by Ed Osowski and the author.

Mr. John Potwora represented LTV Steel.

The inspection revealed that there were two coke side and two push side door leaks, three standpipe leaks and zero lid leaks. Five ovens were timed for visible emissions and the total seconds were 1.8. The allowable leaks are six doors, three standpipes, 4.8 lids and fifty-five seconds for charging emissions. A make-up water sample was taken and was sent for analysis to the laboratory. Three pushes were also observed and the hood captured more than 90% of the emissions generated. Opacity readings of these pushes indicated an average of 2.5% over six readings. The inspection checklist is attached.

The by-products plant was inspected for leaks from components in light oil liquid service. The facility has an adequate inspection program and monitoring log which the author was allowed to inspect. No leaks were detected from the components inspected. The inspection checklist is attached.

The coke and by-products plant were found to be in compliance.

CK/1p/U620L

M. Zamco

Permits

File

Attachment

14 532-0570

EPA-90 (Rev. 6/75-20M)

COKE OVEN BATTERY INSPECTION CHECKLIST

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ttery No.	Oven No.	Start Time of Charge		Total Charge Time	Seconds of Visible Emissions	Cosl Charged (Lhe)		Hain Pressure (mm)	Steem Pressure (ps1)	Bulk Density (Lbs/Ft)	Conme n	t.s	
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2/83

WEEKLY INSPECTION

0F

LIGHT OIL RECOVERY SYSTEM

INSPECTION TO CONSIST OF: V

Visual inspection for loose mounting bolts, pump noise or vibration, leaks at pump, packing gland, discharge valve, casing drain valve and tank drain, discharge sampling valve, pressure switch assembly.

	EQUIPMENT	LOCATION	REMARKS
1.	Wash Oil Pump 5803A	Light Oil Scrubbers	
2.	Wash Oil Pump 5803B	Light Oil Scrubbers	
3.	Wash Oil Pump 5803C	Light Oil Scrubbers	
4.	Scrubber Tank - East	Light Oil Scrubbers	• •
5.	Scrubber Tank - West	Light Oil Scrubbers	
6.	Hot Wash Oil Pump 7109A	Light Oil Recovery Pump House	not in Russia
7.	Hot Wash Oil Pump 7109B	Light Oil Recovery Pump House	mich soul - acmy
8.	Debenzolized Wash Oil Pump 7110A	Light Oil Recovery Pump House	
9.	Debenzolized Wash Oil Pump 7110B	Light Oil Recovery Pump House	mut in pinice